

Appl. No. 10/605,778
Response dated 5/8/2006
Reply to Office Action of 11/7/2006

REMARKS/ARGUMENTS

Claim remarks with regards to 35 U.S.C. §103

The Examiner has rejected claims 1, 13, 14 and 17 as being anticipated by Voss (US 2,035,107) in view of Sirjola (US 6,023,862).

Applicant respectfully points out that neither Voss '107 nor Sirjola '862 have at least the limitation "a platform coupled with two freely rotating sheaves each coupled to opposing sides of said platform". Applicant has not claimed "a plurality of freely rotating sheaves" and as such neither Voss '107 nor Sirjola '862 have the structure of Applicant's invention as claimed. The minimum number of sheaves in Voss is a triality and Sirjola does not even have "freely rotating" sheaves each coupled to opposing sides of said platform" (see Sirjola '862 Figs. 4, 5).

Since neither Voss '107 nor Sirjola '862 comprise all of the limitations of Applicant's invention as claimed, they do not anticipate or render Applicant's invention obvious since the combination of Voss '107 and Sirjola '862 do not combine to form Applicant's invention as claimed.

Applicant respectfully traverses the Examiner's Office Notice with respect to the platform, since the Examiner has not shown a platform with the limitations recited in the claim ("a platform coupled with two freely rotating sheaves each coupled to opposing sides of said platform") yet has stated that all platforms may be substituted for one another. Applicant maintains that all platforms are not created equal, some require 3 or 5 sheaves (Voss '107), some require no sheaves (Sirjola '862). Applicant requests that the Examiner supply a platform as claimed by Applicant if maintaining the current rejection.

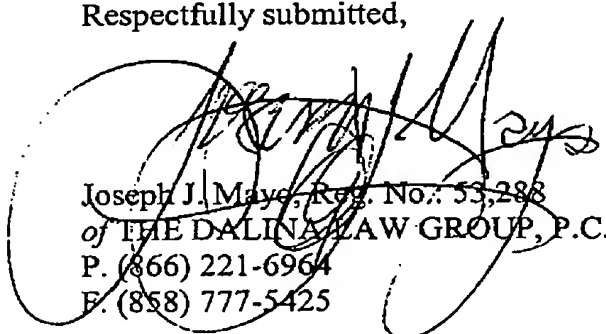
Appl. No. 10/605,778
Response dated 5/8/2006
Reply to Office Action of 11/7/2006

In addition, the Z movement device as define in Applicant's specification is far more encompassing than the apparatus for vertical movement as described in Voss '107. As such, Applicant's invention has many other advantages over all references cited by Applicant or the Examiner.

CONCLUSION

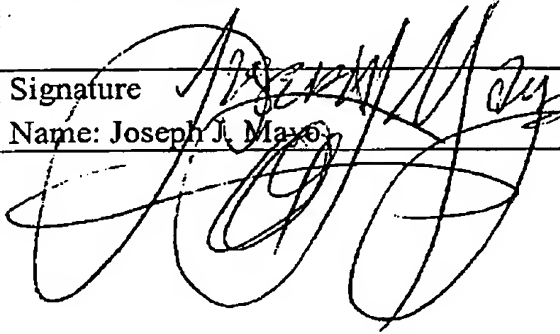
Since all three of Applicant's independent claims and hence dependent claim comprise the limitations that Voss '107 and Sirjola '862 lack, all of Applicant's claims are respectfully novel with respect to the cited references. For at least the reasons stated herein, Applicant respectfully submits that the currently amended claims are in condition for allowance. If the Examiner differs in this conclusion, the Examiner is hereby requested to contact Applicant's representative for purposes of a telephone interview at the number listed below before any action (other than an allowance) is initiated.

Respectfully submitted,



Joseph J. Mayo, Reg. No.: 53,288
of THE DALINA LAW GROUP, P.C.
P. (866) 221-6964
F. (858) 777-5425

Appl. No. 10/605,778
Response dated 5/8/2006
Reply to Office Action of 11/7/2006

<p>Correspondence Info:</p> <p>Customer Number</p> <p>36067</p>	<p><i>CERTIFICATE OF MAILING or TRANSMISSION</i></p> <p><i>I hereby certify that this correspondence is being facsimile transmitted to the United States Patent and Trademark Office on <u>May 8, 2006</u> to 571-273-8300 or is being deposited with the United States Postal Service with sufficient postage as first class mail in an envelope addressed to: Commissioner for Patents, P.O. Box 1450, Alexandria, VA 22313-1450.</i></p>
	<p>Signature  Date: May 8, 2006</p> <p>Name: Joseph J. Mayo</p>